

1 “(b) states a party injured by a violation of this title may institute a civil  
2 action to recover damages and...(c) dictates a civil penalty over and above  
3 actual damages and punitive damages for a willful, intentional, or reckless  
4 violation...may recover a civil penalty not to exceed three thousand dollars  
5 (\$3,000) per violation...(e) Any business that violates, proposes to violate,  
6 or has violated this title may be enjoined...(f) A prevailing plaintiff in any  
7 action commenced shall also be entitled to recover his or her reasonable  
8 attorney's fees and costs...(g) The rights and remedies available under this  
9 section are cumulative to each other and to any other rights and remedies  
10 available under law.”  
11

12 262. Defendants, each of them, violated *Cal. Civ. Code* §1798.85 in excess  
13 of a million times. Thus, Defendants are indebted to Plaintiffs Liberi and Ostella  
14 for civil penalties up to Three Billion Dollars [\$3,000,000,000.00], which is  
15 cumulative to each and other penalty and any other rights and remedies available  
16 under the law.  
17  
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19 263. Defendants’ unlawful conduct as alleged herein was intentional,  
20 oppressive and malicious; therefore Plaintiffs Liberi and Ostella are entitled to the  
21 civil penalties set forth at *Cal. Civ. Code* §1798.84, including exemplary damages,  
22 and all other appropriate relief as further set forth in the Prayer for Relief herein.  
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25 264. As a direct and proximate result of the conduct alleged herein,  
26 Plaintiffs Liberi and Ostella seek to recover actual damages, including, but not  
27 limited to all damages, of any nature, resulting from the unlawful disclosure of  
28

1 their credit reports and personal information to unauthorized third parties. Plaintiffs  
2 Liberi and Ostella also seek statutory damages, penalties, exemplary and punitive  
3 damages, as provided by statute and as further set forth in the Prayer for Relief  
4 herein.  
5

6  
7 **SEVENTH CAUSE OF ACTION**

8 **Cyber-Stalking, Cyber-Harassment, and Cyber-Bullying:**

9 (Plaintiffs Lisa Liberi and Lisa Ostella Against Defendants Orly Taitz as an  
10 Attorney and an Officer of the Court by and through Defendant the Law Offices of  
11 Orly Taitz and as President of Defendants Orly Taitz, Inc. and DOFF)

12 265. Plaintiffs re-allege and incorporate by reference each and every  
13 allegation contained hereinabove as though set forth here in full length.

14 266. Cyber-stalking is the use of the Internet, email or other electronic  
15 communications to stalk, and generally refers to a pattern of harassing, threatening  
16 or malicious behaviors. **Cyber-stalking can be considered to be the most**  
17 **dangerous of the three types of Internet harassment.**  
18

19 267. The following features or combination of features can be considered  
20 to characterize a true stalking situation: malice, premeditation, repetition, distress,  
21 obsession, vendetta, no legitimate purpose, personally directed, disregarded  
22 warnings to stop, harassment, and threats.<sup>4</sup> A number of key factors have been  
23 identified in identifying cyber-stalking:  
24  
25  
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27  
28 <sup>4</sup> Bocij, Paul. Cyberstalking: Harassment in the Internet Age and How to Protect Your Family. Praeger, 2004, pp. 9-10.

- a. False accusations: Cyber-stalkers try to damage the reputation of their victim(s) and turn other people against them by posting false information about them on websites.<sup>5</sup>
- b. Attempts to gather information about the victim. Cyber-stalkers may approach their victim's friends, family and work colleagues to obtain personal information. They may advertise for information on the Internet, or hire a private detective.<sup>6</sup>
- c. Encouraging others to harass the victim. Cyber-stalkers try to involve third parties in the harassment. They may claim the victim has harmed the stalker or his/her family in some way, or may post the victim's name and telephone number in order to encourage others to join the pursuit.<sup>7</sup>
- d. False victimization. The cyber-stalker will claim that the victim is harassing him/her.
- e. Cyber-stalkers often do not threaten their victims, at least not directly;<sup>8</sup> they are more likely to use tactics that harass and threaten their victims,

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<sup>5</sup> Bocij, Paul. *Cyberstalking: Harassment in the Internet Age and How to Protect Your Family*. Praeger, 2004, p. 12

<sup>6</sup> Bocij, Paul. *Cyberstalking: Harassment in the Internet Age and How to Protect Your Family*. Praeger, 2004, p. 13; and *An exploration of predatory behavior in cyberspace: Towards a typology of cyberstalkers* by Leroy McFarlane and Paul Bocij

<sup>7</sup> *An exploration of predatory behavior in cyberspace: Towards a typology of cyberstalkers* by Leroy McFarlane and Paul Bocij

<sup>8</sup> See 1999 Revision of Model State Computer Crimes Code § 2.02.2 - Commentary, available at <http://www.cybercrimes.net/99MSCCC/MSCCC/Article2/2.02.2.html>.

1           **such as posting the victim's name and address on the Internet along**  
2           **with false claims.<sup>9</sup>**

3           268. Harassment is defined as: "*a knowing and willful course of conduct*  
4           *directed at a specific person that seriously alarms, annoys, torments, or terrorizes*  
5           *the person, and that serves no legitimate purpose. The course of conduct must be*  
6           *such as would cause a reasonable person to suffer substantial emotional distress,*  
7           *and must actually cause substantial emotional distress to the person. See Cal. Civ.*  
8           *Code §1708.7(b)(4).*

11           269. Cyber-harassment is an immoral behavior by someone or a group,  
12           who uses technology such as computers, internet or mobile devices to send  
13           disturbing messages to bother, humiliates, threaten, or stalk someone else. The  
14           schemes used consist of emails, blog and website postings, and other means of  
15           electronic communication. "Cyber-stalking and cyber-harassment are similar.  
16           Most people use them interchangeably, but there is a subtle distinction, typically  
17           relating to the perpetrator's intent and the original motivation for their behavior.  
18  
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21  
22           <sup>9</sup> See, e.g., Petherick, *supra* note 130. See also U.S. Dep't of Justice, Cyberstalking: A New  
23           Challenge for Law Enforcement and Industry (August 1999), available at:  
24           <http://www.justice.gov/criminal/cybercrime/cyberstalking.htm>.

25           A cyber-stalker can dupe other Internet users into harassing or threatening a victim by  
26           utilizing their own website, Internet bulletin boards or chat rooms. For example, a  
27           stalker may post a controversial or enticing message on the board about the victim,  
28           resulting in subsequent responses to the victim. Each message -- whether from the  
            actual cyberstalker or others -- will have the intended effect on the victim, but the  
            cyberstalker's effort is minimal and there is lack of direct contact between the  
            cyberstalker and the victim.

1 While the two situations usually involve many of the same online tactics, cyber-  
2 **stalking is almost always characterized by the stalker relentlessly pursuing his**  
3 **or her victim online and is much more likely to include some form of offline**  
4 **attack, as well. This offline aspect makes it a more serious situation as it can**  
5 **easily lead to dangerous physical contact if the victim's location is**  
6 **known...**Cyber-stalkers are often driven by revenge, hate, anger, jealousy,  
7 obsession, and mental illness. While a cyber-harasser may be motivated by some  
8 of these same feelings, often the harassment is driven by the desire to frighten or  
9 embarrass the harassed victim. Sometimes the harasser intends to teach the victim  
10 a lesson in netiquette or political correctness (from the harasser's point of view)."<sup>10</sup>  
11  
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14

15 270. Cyber-bullying is "the use of information and communication  
16 technologies to support deliberate, repeated, and hostile behavior by an individual  
17 or group that is intended to harm others". Cyber-bullying has been defined as  
18 "when the Internet, cell phones or other devices are used to send or post text or  
19 images intended to hurt or embarrass another person" or as "when an electronic  
20 device is used to attack or defame the character of a real person. Often  
21 embarrassing or false information about the victim is posted in an online forum  
22 where the victim and those who know the victim can see it publicly." Cyber-bullies  
23  
24  
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26

27 <sup>10</sup><http://www.informationweek.com/news/security/privacy/showArticle.jhtml?articleID=2911670>  
28 6

1 may disclose victims' personal data (e.g. real name, address, or workplace/schools)  
2 at websites or forums or may pose as the identity of a victim for the purpose of  
3 publishing material in their name that defames or ridicules them. Cyber-stalkers  
4 seek to damage their victim's earnings, employment, reputation, or safety.  
5

6 271. There is no question all the elements of cyber-stalking; cyber-  
7 harassment; and cyber-bullying have been met. In addition, Taitz as an attorney  
8 and an Officer of the Court has been using the Federal Court Docketing system,  
9 knowing the filings will be publicized on scribd.com to further carry out her cyber-  
10 stalking tactics. Taitz has been filing false statements about Ostella, Liberi and  
11 Berg in the Federal Docketing systems of cases unrelated to the Plaintiffs. Then  
12 these filings are downloaded to scribd.com and carried all over the Internet.  
13 Similar to what the Southern Poverty Law Center wrote about sovereign citizens<sup>11</sup>,  
14 Taitz is using our Court's dockets, clouding the issues presented in the case to her  
15 advantage, while using it to further harm the Plaintiffs by her continued false tales.  
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20 272. *Cal. Civil Code* § 1708.7 states:

21  
22 “(a) A person is liable for the tort of stalking when the plaintiff proves all  
23 of the following elements of the tort:  
24  
25

26  
27 <sup>11</sup> The Southern Poverty Law Center [“SPL”] did a write up regarding the sovereign movement  
28 at <http://www.splcenter.org/get-informed/intelligence-report/browse-all-issues/2010/fall/sovereign-citizen-kane>. In so doing, the SPL wrote “The sovereign movement is growing fast, and its partisans are clogging up the courts with their indecipherable filings.”

1 (1) The defendant engaged in a pattern of conduct the intent of which was  
2 to follow, alarm, or harass the plaintiff. In order to establish this  
3 element, the plaintiff shall be required to support his or her allegations  
4 with independent corroborating evidence.

5  
6 (2) As a result of that pattern of conduct, the plaintiff reasonably feared for  
7 his or her safety or the safety of an immediate family member...”

8  
9 “(3) One of the following:

10 (A) The defendant, as a part of the pattern of conduct specified in paragraph  
11 (1), made a credible threat with the intent to place the plaintiff in  
12 reasonable fear for his or her safety, or the safety of an immediate  
13 family member and, on at least one occasion, the plaintiff clearly and  
14 definitively demanded that the defendant cease and abate his or her  
15 pattern of conduct and the defendant persisted in his or her pattern of  
16 conduct.

17  
18 (c) A person who commits the tort of stalking upon another is liable to that  
19 person for damages, including, but not limited to, general damages, special  
20 damages, and punitive damages pursuant to Section 3294.

21  
22 (d) In an action pursuant to this section, the court may grant equitable  
23 relief, including, but not limited to, an injunction.

24  
25 (e) The rights and remedies provided in this section are cumulative and in  
26 addition to any other rights and remedies provided by law.”

1           273. All elements have been met herein. Taitz continued posts evidence  
2 the false statements about Plaintiffs; the false accusations about Plaintiffs; the  
3 constant harassment of Plaintiffs; the bullying of Plaintiffs; the fact Taitz published  
4 Plaintiffs private identifying information; home addresses; home telephone  
5 numbers; third parties have contacted Plaintiffs at the request of Taitz threatening  
6 the Plaintiffs; asking for the public's help; posting Liberi's family photo and  
7 Liberi's single picture; having third parties email and post the information on  
8 Taitz's behalf; Taitz portraying to be the "victim" and accusing the Plaintiffs  
9 (Taitz's victims) of Taitz actual actions; contacting friends and family of Plaintiffs;  
10 the illegal background checks, illegal access to Plaintiffs credit reports and other  
11 private data; filing false law enforcement reports; the fact Taitz was posting her  
12 untruths about Plaintiffs repeatedly for the past 2 years. Taitz was put on notice  
13 and demanded to stop these dangerous behaviors several times, and Plaintiffs  
14 attempted to obtain a restraining order to stop the illegal behaviors. Despite  
15 Plaintiffs attempts, Taitz has continued, still to this date.

16           274. Taitz sought out and consulted with a third-party, James Sundquist  
17 and had him create false law enforcement reports; State of New Jersey reports and  
18 reports which were sent to Ostella's customers of Go Excel Global, which included  
19 but was not limited to political affiliations; groups in which Ostella was a  
20 respected member; businesses and individuals and inform them that he was in  
21

1 possession of a database on Ostella, which he received from Taitz, informing  
2 Ostella's associates and customers that Ostella was stealing monies from Taitz's  
3 foundation; that Ostella had a criminal history and to contact Orly Taitz for more  
4 information. Taitz had Mr. Sundquist contact all these agencies, using his  
5 credentials as a Minister and Author while referencing Taitz as an Officer of the  
6 Court. Mr. Sundquist complied with Taitz's requests.

9 275. Taitz openly threatened to destroy Liberi and get rid of her; Taitz  
10 threatened to have Ostella's children professionally kidnapped; Taitz has called for  
11 the "political purging" of Liberi and Ostella. The meaning of political purging is  
12 to kill. Plaintiffs, Liberi and Ostella took these threats serious and have reported  
13 the crimes to their law enforcement agencies. The problem is, the crimes cross so  
14 many state lines, they are state crimes, and both law enforcement and the FBI  
15 repeatedly have told Plaintiffs Liberi and Ostella to obtain a restraining order.

19 276. Plaintiffs Liberi and Ostella have lived and continue living in fear  
20 daily for themselves, husbands and children, as a result of Taitz illegal behaviors  
21 outlined herein. Both Liberi and Ostella have received death threats if they did **not**  
22 drop the lawsuit against Taitz, strange people have shown up at Plaintiffs home;  
23 Ostella had family pets slaughtered as outlined herein. Both Plaintiffs Liberi and  
24 Ostella have suffered severe emotional distress as a result. In fact, Liberi has  
25 suffered severe medical complications, including but **not** limited to cardiac  
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1 complications as a result of the severe stress and fear, which has required  
2 immediate medical assistance, hospitalization, paramedic assistance and cardiac  
3 treatments. Taitz was aware of Liberi's medical complications as Taitz has  
4 published statements pertaining to Liberi's medical as well as filed it with this  
5 Court. Ostella, as a result of Taitz coming to NJ, driving around where she lives  
6 and by her children's school, and a picture of her daughter showing up on the  
7 Internet standing in front of her school, was forced to sell her house to an investor,  
8 under market value, to avoid people coming into the house and moved within two  
9 months of this incident to protect her family.  
10  
11  
12

13 277. As a direct and proximate cause of Defendants cyber-stalking, cyber-  
14 harassment and cyber-bullying of Plaintiffs, Plaintiffs Liberi and Ostella have  
15 been, among other things, scared, embarrassed, mortified, humiliated before the  
16 general public; live in fear for themselves, husbands and children daily and have  
17 suffered severe emotional distress.  
18  
19

20 278. It should also be noted that Defendants cyber-stalking; cyber-  
21 harassment; and cyber-bullying of Plaintiffs Liberi and Ostella also committed the  
22 crime of stalking pursuant to *Cal. P.C. §646.9(a)*; Communications Act, 47 U.S.C.  
23 § 223(a)(1)(C) and § 223(h)(1)(B); and the Women's Violence Act, Department of  
24 Justice Reauthorization Act of 2005, H.R. 3402, titled "Preventing Cyberstalking"  
25 and numbered as §113.  
26  
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1           279. Defendants Orly Taitz as an Attorney and an Officer of the Court by  
2 and through Defendant the Law Offices of Orly Taitz and as President of  
3 Defendants Orly Taitz, Inc. and DOFF's unlawful conduct as alleged herein was  
4 intentional, oppressive and malicious; therefore Plaintiffs Liberi and Ostella are  
5 entitled to civil penalties, punitive, actual, exemplary damages, and all other  
6 appropriate relief as further set forth in the Prayer for Relief herein. Plaintiffs also  
7 seek an immediate restraining order pursuant to *Cal. Civ. Code* § 1708.7(d).  
8  
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10           280. As a direct and proximate result of the conduct alleged herein,  
11 Plaintiffs Liberi and Ostella seek to recover actual damages, including, but **not**  
12 limited to all damages, of any nature, resulting from the Defendants placing  
13 Plaintiffs Liberi, Berg and Ostella in a False Light before the Public. Plaintiffs  
14 Liberi, Berg and Ostella also seek statutory damages, penalties, exemplary and  
15 punitive damages, as provided by statute and as further set forth in the Prayer for  
16 Relief herein.  
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20                           **EIGHTH CAUSE OF ACTION**

21                           **Defamation Per Se, Slander and Libel Per Se:**

22                           (All Plaintiffs against All Defendants)  
23

24           281. Plaintiffs re-allege and incorporate by reference each and every  
25 allegation contained hereinabove as though set forth here in full length.  
26

27           282. As outlined in the *Cal. Civ. Code* §44, "Defamation is effected by  
28 either of the following: (a) Libel; (b) Slander. Libel is a false publication by

1 “writing, printing, picture, effigy or other fixed representation to the eye which  
2 exposes any person to hatred, contempt, ridicule or obloquy, or which causes him  
3 to be shunned or avoided, or which has a tendency to injure him in his  
4 occupation”, see Cal. Civ. Code §45. “A libel which is defamatory of the plaintiff  
5 without the necessity of explanatory matter, such as an inducement, innuendo or  
6 other extrinsic fact, is said to be a libel on its face.”, just as Taitz and Sankey have  
7 done to Plaintiffs Liberi and Ostella, Cal. Civ. Code §45a.

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11 283. Slander is a false publication, “orally uttered, and also  
12 communications by radio or any mechanical or other means which (1.) charges  
13 any person with crime, or with having been indicted, convicted or punished for  
14 crime; (3) tends directly to injure him in respect to his office, profession, trade or  
15 business...; or (5.) which, by natural consequence causes actual damage.”, see  
16 Cal. Civ. Code §46.  
17

18  
19 284. As for the publication of Plaintiffs Social Security number, address,  
20 drivers license information, credit information, etc. Publications of this private  
21 data California State Bar Rules of Professional Conduct 5-120, see Cal. Civ. Code  
22 §47.  
23

24  
25 285. The false, misleading and defamatory statements disseminated by the  
26 Defendants all over the Internet, by mass emailing, by postal mailing, hand  
27 delivery, and posting all over the World Wide Web portray Liberi as a lifelong  
28

1 document forger, a perjure, a person with current criminal charges pending against  
2 her, violating her probation, of slandering and defaming individuals, of stealing, of  
3 “hacking”, of being dangerous, of “murdering her sister”, of tampering with Taitz  
4 vehicles to harm her, of having 27, 46, 80, 100, and 200 felony counts against her,  
5 of having a criminal history going back to the 1990’s, of being convicted of  
6 forging documents; of being convicted of 27, 46, and other false numbers criminal  
7 counts; of having multiple Social Security numbers illegally, defrauding the courts,  
8 forging court documents in the within case, of Social Security Fraud, and the other  
9 false allegations outlined herein above made by Neil Sankey by and through  
10 Sankey Investigations and The Sankey Firm owned by Todd Sankey, Orly Taitz as  
11 an Attorney and an Officer of the Court by and through the Law Offices of Orly  
12 Taitz and as President of Orly Taitz, Inc. and DOFF, with knowledge of the false  
13 and libelous nature of the statements contained therein and with gross negligence  
14 and reckless disregard for the truth.

20           286. The false, misleading and defamatory statements disseminated by  
21 Defendants portray Lisa Ostella as a thief, a “hacker”, of stealing, having a long  
22 criminal record, of slander, libel and defamation, of “hijacking” Taitz websites and  
23 blogs, which Ostella owned, of seeking monies in the name of Taitz Corporation,  
24 DOFF, forgery, perjury, defrauding the courts, and the other false allegations  
25 outlined hereinabove. The posts and statements were made by Neil Sankey by and  
26  
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28

1 through Sankey Investigations and The Sankey Firm owned by Todd Sankey, Orly  
2 Taitz as an Attorney and an Officer of the Court by and through the Law Offices of  
3 Orly Taitz and as President of Orly Taitz, Inc. and DOFF, with knowledge of the  
4 false and libelous nature of the statements contained therein and with gross  
5 negligence and reckless disregard for the truth.  
6  
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8 287. The false, misleading and defamatory statements disseminated by  
9 Defendants portray Berg as dishonest, a thief, of forging court documents in this  
10 case, of perjury, subornation of perjury, defrauding the courts, making monies  
11 using DOFF's name, slander, libel and defamation, and the other false allegations  
12 outlined herein above made by Neil Sankey by and through Sankey Investigations  
13 and The Sankey Firm owned by Todd Sankey, Orly Taitz as an Attorney and an  
14 Officer of the Court by and through the Law Offices of Orly Taitz and as President  
15 of Orly Taitz, Inc. and DOFF, with knowledge of the false and libelous nature of  
16 the statements contained therein and with gross negligence and reckless disregard  
17 for the truth.  
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22 288. Defendants Neil Sankey through Sankey Investigations, Inc. and The  
23 Sankey Firm owned by Todd Sankey, Orly Taitz as an Attorney and an Officer of  
24 the Court by and through the Law Offices of Orly Taitz and as President of Orly  
25 Taitz, Inc. and DOFF have intentionally disseminated with malice their hearsay  
26 version of events leading to a conviction against Liberi with knowledge of the false  
27  
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1 and libelous nature of the statements contained therein and with gross negligence  
2 and reckless disregard for the truth.  
3

4 289. The Reed and Intelius Defendants have published statements to  
5 various credit reporting agencies, other information selling agencies, and other  
6 entities and individuals that the above referenced incorrect, inaccurate and  
7 derogatory information belongs to the Plaintiffs.  
8

9 290. The Reed and Intelius Defendants furnished this information to  
10 Defendants Yosef Taitz; Daylight CIS.; Orly Taitz; Neil Sankey; The Sankey Firm,  
11 Inc; Sankey Investigations; Todd Sankey; and other third party information  
12 gathers, none of which had a permissible purpose for said information. In turn, the  
13 information was posted all over the internet; sent by mass emailing; filed in Court  
14 actions; sent by mass mailing; by hand delivery; and other ways, including  
15 internationally and to domestic terrorists and extremists since April 2009,  
16 repeatedly. This libelous and defamatory information has been provided to over a  
17 million individuals and companies, including news and media outlets.  
18  
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22 291. The statements made by the Reed and Intelius Defendants are false in  
23 that they inaccurately reflect upon Plaintiffs and paint the Plaintiffs as irresponsible  
24 and committing criminal acts.  
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26  
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28

1           292. The Reed and Intelius Defendants knew the statements were false  
2 when made, and had no factual basis for making the statements, as Plaintiffs had  
3 notified them several times.  
4

5           293. Nonetheless, the Reed and Intelius Defendants continue to publish the  
6 false and negative information concerning the Plaintiffs up through the present  
7 time.  
8

9           294. The Reed and Intelius Defendants conduct was and is a direct and  
10 proximate cause, as well as a substantial factor, in bringing about the serious  
11 injuries, damages and harm to the Plaintiffs that are outlined more fully above.  
12

13           295. Defendants' defamatory, slanderous and libelous statements have  
14 damaged and injured Plaintiffs Liberi, Berg, Ostella, Go Excel Global and the Law  
15 Offices of Philip J. Berg. Furthermore, all the false, libel and defamatory postings  
16 all over the Internet have been carried by third party websites, tweeted and sent out  
17 through numerous social networks and RSS feeds.  
18  
19

20           296. As a direct and proximate cause of the publication and republication  
21 of Defendants defamatory, slanderous and libel statements, Plaintiffs Liberi, Berg  
22 and Ostella have been, among other things, embarrassed, mortified, lost all clients,  
23 and humiliated before the general public and have suffered severe emotional  
24 distress. Defendants Orly Taitz as an Attorney and an Officer of the Court by and  
25 through the Law Offices of Orly Taitz continually attempted to have Liberi and  
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1 Ostella falsely arrested in whole, because of the negative and false portrait of their  
2 conduct that Defendants have created. Plaintiffs Liberi, Berg and Ostella's  
3 reputation as honest, loyal and caring individuals who are good in their professions  
4 have been seriously harmed and will now always bear a stain of being associated  
5 with the false statements and allegations published and republished by the  
6 Defendants.  
7

8  
9 297. The remedies provided for in this section are cumulative and shall be  
10 in addition to any others provided for by law.  
11

12 298. As outlined in *Cal. Civ. Code* §48a(2) Plaintiffs are entitled to  
13 general, special and exemplary damages as Defendants statements, writings, posts,  
14 radio interviews; print interviews; television interviews; etc. containing the false  
15 and fabricated information outlined hereinabove, were done with malice and  
16 Defendants refused to retract the statements, writings, postings, etc. upon demand.  
17

18  
19 299. Defendants' unlawful conduct as alleged herein was intentional,  
20 oppressive and malicious; therefore Plaintiffs Liberi, Ostella, Berg, Go Excel  
21 Global and the Law Offices of Philip J. Berg are entitled to civil penalties,  
22 punitive, actual, exemplary damages, and all other appropriate relief as further set  
23 forth in the Prayer for Relief herein.  
24

25  
26 300. As a direct and proximate result of the conduct alleged herein,  
27 Plaintiffs Liberi, Berg, Ostella, Go Excel Global and the Law Offices of Philip J.  
28

1 Berg seek to recover actual damages, including, but **not** limited to all damages, of  
2 any nature, resulting from the Defendants defamatory, slanderous and libel stories  
3 and statements about Plaintiffs Liberi, Berg and Ostella. Plaintiffs Liberi, Berg,  
4 Ostella, Go Excel Global and the Law Offices of Philip J.  
5 Berg also seek statutory damages, penalties, exemplary and punitive damages, as  
6 provided by statute and as further set forth in the Prayer for Relief herein.  
7

8  
9 **NINTH CAUSE OF ACTION**

10 **Intentional Infliction of Emotional and Mental Distress:**

11 (All Plaintiffs against All Defendants)  
12

13 301. Plaintiffs re-allege and incorporate by reference each and every  
14 allegation contained hereinabove as though set forth here in full length.  
15

16 302. Defendants, each and all of them, engaged in outrageous conduct by  
17 invading Plaintiffs privacy; invading Plaintiffs solitude and private affairs;  
18 disclosing and publicizing private facts about the Plaintiffs; placing Plaintiffs in a  
19 false light before the public's eye; defaming, slandering and libeling Plaintiffs;  
20 maliciously prosecuting Plaintiff Liberi; cyber-stalking Plaintiffs Liberi and  
21 Ostella; cyber-harassing Plaintiffs Ostella and Liberi; and cyber-bullying Plaintiffs  
22 Liberi and Ostella.  
23

24 303. The Reed and Intelius Defendants, without any type of permissible  
25 purpose and without maintaining the Plaintiffs private data confidential as  
26 required, and without the Plaintiffs knowledge and/or permission, furnished to the  
27  
28

1 third parties mentioned herein, including Defendants Yosef Taitz, Daylight CIS,  
2 which was enabled by Defendant Oracle through Daylight CIS Applications. In  
3 turn Defendants Yosef Taitz through his Corporation, Daylight Chemical CIS gave  
4 the private identifying data to his wife, Orly Taitz, to assist and help her carry out  
5 her threats against Plaintiffs. Orly Taitz then began inciting violence against  
6 Plaintiffs Liberi and Ostella calling for people who she believed resided near  
7 Plaintiffs.  
8

9  
10 304. Defendant Yosef Taitz through his Corporation, Daylight CIS created  
11 Daylight Toolkits for dual purpose intent. The Daylight applications are part of  
12 Oracle's design. Oracle is scripted, through the use of Daylight Applications to  
13 interface all information, including but not limited to all information stored on  
14 Oracle servers, all customer log-in details and other private data, back to  
15 Defendant Taitz's and Daylight CIS's remote servers.  
16  
17

18  
19 305. Defendant Oracle knew about the dual purpose vulnerabilities of  
20 Defendants Yosef Taitz and Daylight CIS' nefarious scripting.  
21

22 306. The Reed and Intelius Defendants use Defendant Oracle's servers  
23 embedded with dual purpose applications provided by Defendants Taitz and  
24 Daylight CIS.  
25

26 307. Defendants Yosef Taitz and Daylight CIS provided all of Plaintiffs  
27 private personal identifying information, financial data, family data, birth data, and  
28

1 other private information to his wife, who used the information to carry out her  
2 threats against the Plaintiffs.  
3

4 308. In disseminating and distributing Plaintiffs private data, and failing to  
5 uphold our State and Federal laws, the Reed Defendants and Defendants Intelius,  
6 Inc., Yosef Taitz, Daylight CIS and Oracle Defendants acted willfully,  
7 intentionally, recklessly and maliciously and their conduct was illegal, outrageous,  
8 extreme and intolerable in that it offends generally accepted standards of decency  
9 and morality.  
10  
11

12 309. The aforesaid wrongful conduct on the part of the Reed Defendants  
13 and Defendants Intelius, Inc., Yosef Taitz, Daylight CIS and Oracle amounted to  
14 an intentional infliction of mental suffering and severe emotional distress upon the  
15 Plaintiffs. In particular and without limiting the generality of the foregoing, the  
16 references to the Plaintiffs and the distribution of Plaintiffs private data to third  
17 parties for purposes to harm and carry out their threats against the Plaintiffs;  
18 without any type of permissible purpose, without authorization or knowledge of  
19 the Plaintiffs; and which the private data was published all over the Internet and  
20 sent to in excess of a million individuals caused Plaintiffs severe emotional  
21 anguish and distress. In addition, Plaintiff Liberi suffered severe medical  
22 complications which resulted in hospitalization and; paramedic visits; medical  
23 procedures; and extensive medical bills.  
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1           310. Defendants, each and all of them, engaged in this outrageous conduct  
2 with the intention to cause, or reckless disregard of the probability of causing,  
3 emotional distress to Plaintiffs. In fact, Sankey and Taitz both have talked about  
4 Liberi's serious medical conditions on radio shows; posting on their websites; and  
5 filing the statements with this Court. They were well aware the stress would cause  
6 serious medical complications for Liberi, and were well aware the stress caused by  
7 them could lead to Liberi's death. As stated hereinabove, Liberi has had to obtain  
8 emergency help from paramedics; hospitalizations; cardiac treatments; medication;  
9 and other medical services as a result of the medical complications caused by the  
10 stress she was forced to endure at the hands of the Defendants.  
11

12           311. As a direct and proximate result of Defendants illegal actions,  
13 Plaintiffs have suffered severe emotional distress. In addition thereto, Liberi  
14 suffered severe medical complications as a direct result of the stress requiring  
15 hospitalization, medical care; medications; emergency help from the paramedics,  
16 etc.  
17

18           312. The remedies provided for in this section are cumulative and shall be  
19 in addition to any others provided for by law.  
20

21           313. Defendants' unlawful conduct as alleged herein was intentional,  
22 oppressive and malicious; therefore Plaintiffs are entitled to civil penalties,  
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1 punitive, actual, exemplary damages, and all other appropriate relief as further set  
2 forth in the Prayer for Relief herein.

3  
4 314. As a direct and proximate result of the conduct alleged herein,  
5 Plaintiffs Liberi, Berg and Ostella seek to recover actual damages, including, but  
6 **not** limited to all damages, of any nature, resulting from the Defendants intentional  
7 infliction of emotional and mental duress. Plaintiffs Liberi, Berg and Ostella also  
8 seek statutory damages, penalties, exemplary and punitive damages, as provided by  
9 statute and as further set forth in the Prayer for Relief herein.  
10  
11

12 **TENTH CAUSE OF ACTION**

13 **Malicious Prosecution:**

14 (Plaintiff Lisa Liberi against Defendants Orly Taitz as an Attorney and an Officer  
15 of the Court through Defendant the Law Offices of Orly Taitz and as President of  
16 Defendants Orly Taitz, Inc. and DOFF; Neil Sankey; Todd Sankey; Sankey  
17 Investigations, Inc. and The Sankey Firm)

18 315. Plaintiffs re-allege and incorporate by reference each and every  
19 allegation contained hereinabove as though set forth here in full length.

20  
21 316. Defendants had **no** probable cause to file the "Motion for Emergency  
22 Revocation of Probation" against Liberi in San Bernardino County Superior Court,  
23 Rancho Cucamonga Division, Case No. FVW-028000 or to make the allegations in  
24 that they did **not** honestly, reasonably, and in good faith believe the allegations to  
25 be true. As clearly demonstrated by the letter Taitz received from Deputy District  
26 Attorney with the San Bernardino County District Attorney's office.  
27  
28

1           317. Defendants acted with malice in that they brought the action with the  
2 improper motive of publicizing that Liberi was in violation of her probation, and  
3 their attempts to have Liberi falsely arrested, and there were hearings as a result,  
4 when it was Defendants that filed the action in the Court based on false allegations.  
5

6           318. As a result of the false allegations and demand to revoke Liberi's  
7 probation filed by Orly Taitz as an Attorney and an Officer of the Court by and  
8 through the Law Offices of Orly Taitz, the Judge held three (3) hearings out of  
9 professional courtesy. Taitz in turn posted all over her website that there were  
10 probation revocation hearings against Liberi and failed to tell the public that she  
11 caused said hearings by her filing of false statements and allegations.  
12  
13

14           319. Further, Taitz was seeking people to attend the Court proceedings and  
15 falsely claim they were victims in attempts to support the Defendants false  
16 allegations and accusation against Plaintiff Liberi.  
17  
18

19           320. Defendants acted with fraud and actual malice in that, knowing  
20 Plaintiff Liberi was about to be released from probation and their malicious  
21 attempts to have Liberi arrested and jailed on false allegations, in attempts to make  
22 the within lawsuit go away. Defendants publicized the false allegations knowing  
23 the allegations were of such serious nature that they would inevitably damage  
24 Plaintiff Liberi. Defendants acted solely on the improper purpose with conscious  
25 disregard for the rights of Plaintiff Liberi. Defendants' intent was to make Plaintiff  
26  
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1 an object of ridicule and hatred, to portray her as unethical and criminal, to bring  
2 her public and personal humiliation, to inflict financial damage on her, and to  
3 damage her reputation by ascribing conduct and character that would adversely  
4 reflect on her.  
5

6 321. The fact that Judge Sabet with the San Bernardino Court, Rancho  
7 Cucamonga Division who heard Taitz's false and malicious demands found  
8 absolutely no merit in the allegations which amounted to a favorable termination  
9 of the proceedings for Plaintiff Liberi. Further, it is documented in the Case file  
10 that at least seven (7) separate State investigative agencies and two (2) Federal  
11 agencies investigated Taitz and Sankey's allegations and found absolutely no merit  
12 in them. Taitz and the other Defendants continued their false reports for the last  
13 two (2) years attempting to have Liberi falsely arrested based on their meritless,  
14 groundless and false accusations.  
15

16 322. There is absolutely no question and is demonstrated by the  
17 proceedings that Defendants had no evidence supporting their allegations and that  
18 the action had absolutely no merit.  
19

20 323. The remedies provided for in this section are cumulative and shall be  
21 in addition to any others provided for by law.  
22

23 324. Defendants' unlawful conduct as alleged herein was intentional,  
24 oppressive and malicious; therefore Plaintiff Liberi is entitled to civil penalties,  
25  
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27  
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1 punitive, actual, exemplary damages, and all other appropriate relief as further set  
2 forth in the Prayer for Relief herein.

3  
4 325. As a direct and proximate result of the conduct alleged herein,  
5 Plaintiff Liberi seeks to recover actual damages, including, but **not** limited to all  
6 damages, of any nature, resulting from the Defendants Malicious Prosecution of  
7 Plaintiff Liberi. Plaintiff Liberi also seeks statutory damages, penalties, exemplary  
8 and punitive damages, as provided by statute and as further set forth in the Prayer  
9 for Relief herein.  
10  
11

12 **ELEVENTH CAUSE OF ACTION**  
13 **Abuse of Process:**

14 (Plaintiff Lisa Liberi against Defendant Orly Taitz as an Attorney and an Officer of  
15 the Court through Defendant the Law Offices of Orly Taitz and as President of  
16 Defendants Orly Taitz, Inc. and DOFF; Neil Sankey; Todd Sankey; Sankey  
17 Investigations, Inc. and The Sankey Firm)

18 326. Plaintiffs re-allege and incorporate by reference each and every  
19 allegation contained hereinabove as though set forth here in full length.

20 327. Defendants misused the legal process by filing their Motion for an  
21 Emergency Revocation of Probation on Liberi, based on false allegations and  
22 accusations, knowing they were false, for the sole purpose to have Liberi arrested  
23 and jailed.  
24  
25

26 328. Further, Defendants sole purpose of the filing was to publicize the  
27 hearings, which Taitz, as an Attorney and an Officer of the court by and through  
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